

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**AMANDA APODACA, Individually, and
as Parent and Next Friend to A.B., a minor
child,**

Plaintiff,
vs. **No. _____**

**JONATHAN HERRON, and
GAINSCO INSURANCE COMPANY,**

Defendants.

**COMPLAINT TO RECOVER DAMAGES FOR PERSONAL INJURY (GROSS
NEGLIGENCE OR, IN THE ALTERNATIVE, NEGLIGENCE AND NEGLIGENCE
PER SE) AND FOR DECLARATORY JUDGMENT
(AUTOMOBILE COLLISION)**

Plaintiffs Amanda Apodaca, Individually and as Parent and Next Friend to A.B., a minor child, through counsel, Anna C. Martinez, for her cause of action against the above-named Defendants, states as follows:

PARTIES, VENUE AND JURISDICTION

1. Plaintiff is a resident of Bernalillo County, New Mexico.
2. Upon information and belief, Defendant Jonathan Herron is also a resident of Illinois.
3. Defendant GAINSCO Insurance Company is a foreign corporation and joined pursuant to the New Mexico Mandatory Financial Responsibility Act (MFRA), NMSA 1978, §§ 66-5-201 to 239, and *Raskob v. Sanchez*, 1998-NMSC-045.
4. Defendant GAINSCO Insurance Company has its primary place of business is located in Dallas, Texas.

5. All of the events giving rise to this Complaint occurred in Bernalillo County, New Mexico.

6. Plaintiffs' claims are in excess of the jurisdictional limit of \$75,000.00.

7. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(a)(2) as a substantial part of the events and omissions giving rise to the claim occurred in the State of New Mexico.

8. Jurisdiction over this lawsuit is founded only on diversity of citizenship. A substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in this judicial district (as well as in this division). 28 U.S.C. § 1391(a)(2).

FACTUAL BACKGROUND

9. On February 18, 2021, Albert Simmons, an Albuquerque Police Officer, who had been traveling west on Trumbull SE, was stopped at the red light at Trumbull and Louisiana SE, when he observed two cars stopped at the signal facing eastbound. *See, attached, Exhibit A: New Mexico Uniform Crash Report No. 710777127.*

10. Defendant Jonathan Herron ("Defendant Herron") was driving the second car at the east bound light. *Id.*

11. The car in front of Defendant Herron made a legal righthand turn on the red signal. *Id.*

12. Defendant then drove into the intersection against the red light. *Id.*

13. Officer Simmons reported that he "observed two vehicles stopped at the light in the east bound lanes of Trumbull, just west of the intersection , writing:

I suddenly observed the lead car on east bound Trumbull turn south on Louisiana while the traffic signal was still red. At that point, I recalled the light to still be red for both west and east Trumbull when I suddenly observed vehicle #2 [driven by Defendant Herron] enter the intersection and east and collide[] with vehicle #1 [driven by Plaintiff] in the middle of the intersection.

Id.

14. Officer Simmons immediately called dispatch and had them send “paramedics due to the heavy vehicle damage.” *Id.*

15. Once paramedics arrived, Officer Simmons spoke to Defendant Herron. *Id.*

16. Defendant Herron falsely claimed that the light at the intersection turned green for him before he entered the intersection. *Id.*

17. Defendant Herron falsely claimed that the collision was Plaintiff’s fault because Defendant said his light was green. *Id.*

18. Defendant’s light was red. *Id.*

19. Officer Simmons explained to Defendant that the officer had seen the entire accident, which included seeing the light and seeing that Defendant entered against the red. *Id.*

20. At the time of the collision, Plaintiff and her son were both wearing their seatbelts. *Id.*

21. Plaintiff was driving through the intersection with a green light, when she was struck by Defendant Herron. *Id.*

22. There is no legitimate dispute over the factors contributing to this collision.

23. The police report, which in this case was prepared by an eyewitness, makes it clear that Defendant Herron’s decision to run the red light as the sole and apparent contributing factor to this collision. *Id.*

24. Had Defendant not been unlawfully operating—and paying all of his attention to—the crash at issue would never have happened.

25. The weather was clear and dry.

26. There were no visibility problems for any motorists.

27. Defendant was not looking at the traffic light while he operated a motor vehicle, in violation of traffic laws that required him to keep a proper look out and not to operate a motor vehicle in a careless or reckless manner.

28. Defendant's improper operation of a motor vehicle was the sole cause of the collision.

29. Defendant is liable to Plaintiff for all of Plaintiff's compensable injuries and recoverable damages.

30. Defendant's acts were willful, wanton, obdurate, and perpetrated with gross disregard for the safety of others.

31. Plaintiff is entitled to an award of punitive damages to dissuade Defendant and other like-minded individuals from operating a vehicle in this manner in the future.

32. As a result of Defendant's acts, Plaintiff and her son, A.B., suffered serious injury.

33. Plaintiff's motor vehicle was destroyed in the collision.

34. Defendant was both the actual and the proximate cause of the motor vehicle collision at issue in this case.

35. Prior to this collision, Plaintiff and her minor, A.B., were in good health and enjoyed a normal and active lifestyles.

36. After Defendant collided with Plaintiff's vehicle, Plaintiff and her minor child, A.B., had difficulty participating in routine life activities.

37. Plaintiff and her minor child, A.B., endured anxiety and sporadic pain that limit his daily activities.

**COUNT I: DEFENDANT'S GROSS NEGLIGENCE
(COMPENSATORY AND PUNITIVE DAMAGES)**

Plaintiff incorporates by reference all of the preceding paragraphs as though fully stated herein.

38. Defendant had a duty to exercise reasonable and ordinary care for the safety of others while driving a motor vehicle.

39. Defendant failed to exercise reasonable and ordinary care for the safety of others, and in particular, Plaintiff and her child.

40. Defendant's failure was the result of his gross and reckless disregard for the safety of others, including Plaintiff.

41. Upon information and belief, the grossly negligent acts and omissions of Defendant include but are not limited to:

- a. Operating a motor vehicle while distracted;
- b. Operating a motor vehicle without paying attention to the safety of other people;
- c. Failure to keep a proper look-out;
- d. Failure to yield traffic signal;
- e. Failure to yield to traffic;
- f. Failure to pay proper attention to surroundings while operating a motor vehicle;
- g. Failure to operate a vehicle in a safe and reasonable manner;
- h. Driving the vehicle in violation of existing traffic laws.

42. As a direct and proximate result of Defendant's gross negligence, Plaintiff and her minor child, A.B., suffered general damages including, but not limited to: medical damages, pain and suffering, emotional trauma and suffering of the type and variety that anyone could be expected to endure under like circumstances, lost enjoyment of life; damages resulting from the nature, extent, and duration of the injury, including lost functional capacity, lost household

services; lost wages; out-of-pocket expenses, property damage,; and other damages to be proven at trial.

43. The collision complained of herein was the product of Defendant's willful, wanton, obdurate, and conscience-shocking heedlessness for the safety of others. Plaintiff is consequently entitled to compensatory damages as well as an award of punitive damages to dissuade Defendant and others similarly situated from engaging in like behavior in the future.

**ALTERNATIVE COUNT I: DEFENDANT'S NEGLIGENCE
(COMPENSATORY DAMAGES)**

Plaintiff incorporates by reference all of the preceding paragraphs as though fully stated herein.

44. Defendant had a duty to exercise reasonable and ordinary care for the safety of others while driving a motor vehicle.

45. Defendant failed to exercise reasonable and ordinary care for the safety of others, and in particular, Plaintiff.

46. Defendant's failure was the result of his grossly negligent or, in the alternative, negligent, disregard for the safety of others, including Plaintiff.

47. Upon information and belief, the grossly negligent or, in the alternative, negligent, acts and omissions of Defendant include but are not limited to:

- a. Operating a motor vehicle while distracted;
- b. Failure to yield traffic signal;
- c. Failure to keep a proper look-out;
- d. Failure to yield to traffic;
- e. Failure to pay proper attention to surroundings while operating a motor vehicle;
- f. Failure to operate a vehicle in a safe and reasonable manner;
- g. Driving the vehicle in violation of existing traffic laws.

48. As a direct and proximate result of Defendant's negligence, which is included as an alternative the gross negligence previously alleged, Plaintiff and her minor son, A.B., suffered general damages including, but not limited to: medical expenses, pain and suffering, emotional trauma and suffering of the type and variety that anyone could be expected to endure under like circumstances, lost enjoyment of life; damages resulting from the nature, extent, and duration of the injury, including lost functional capacity, lost household services; lost wages; out-of-pocket expenses, property damage,; and other damages to be proven at trial.

49. Plaintiff contends that Defendant was grossly negligent, but should the Court and/or a jury determine that the collision complained of herein was *not* the product of Defendant's willful, wanton, obdurate, and conscience-shocking heedlessness for the safety of others, the collision was *nevertheless* the product of Defendant's negligence. Plaintiff is therefore entitled to compensatory damages.

COUNT II: DEFENDANT'S NEGLIGENCE *PER SE*

Plaintiff incorporates by reference all of the preceding paragraphs as though fully stated herein.

50. Defendant's conduct violated NMSA 1978, § 66-8-113(A), which provides, in pertinent part:

Any person who drives any vehicle carelessly and heedlessly in willful or wanton disregard of the rights or safety of others and without due caution and circumspection and at a speed or in a manner so as to endanger or be likely to endanger any person or property is guilty of reckless driving.

51. Defendant's conduct was a violation of NMSA 1978, § 66-8-114(A), which provides:

Any person operating a vehicle on the highway shall give his full time and entire attention to the operation of the vehicle.

52. Defendant's conduct was also a violation of NMSA 1978, § 66-8-114(B), which provides, in pertinent part:

Any person who operates a vehicle in a careless, inattentive or imprudent manner, without due regard for the ... traffic ... and road conditions and all other attendant circumstances is guilty of a misdemeanor.

53. NMSA 1978, §§ 66-8-113, -114(A) and -114(B), as well as NMSA 1978, §66-7-364 were enacted for the benefit and protection of a class of the public of which Plaintiff was a member.

54. Consequently, Defendant's violation of these statutes constitutes negligence *per se*.

55. The injuries that Plaintiff suffered are of the type that the legislature sought to prevent when it enacted the statutes referred to herein.

56. As a direct and proximate result of Defendant's negligence *per se*, Plaintiff and her minor child, A.B., experienced general damages, including but not limited to: medical expenses, physical pain and suffering, emotional trauma and suffering of the type and variety that anyone could be expected to endure under like circumstances, lost wages, out-of-pocket expenses, property damage, and other damages in an amount to be proven at trial. In addition, because of his injuries, Plaintiff has had a disrupted quality of life and has faced interference with her normal activities and routines, which has caused a loss of life's enjoyment despite Plaintiff's efforts to try to continue unhindered with his life.

57. The collision complained of herein was the product of Defendant's heedlessness and his willful, wanton, obdurate, and conscience-shocking heedlessness for the safety of others.

58. Defendant was negligent *per se*.

59. Plaintiff is therefore also entitled to seek both an award of compensatory damages and an award of punitive damages to dissuade Defendant and others similarly situated from engaging in like behavior in the future.

COUNT IV: DECLARATORY JUDGMENT

Plaintiff incorporates by reference all of the preceding paragraphs as though fully stated herein.

60. Plaintiff seeks a judicial determination of liability against Defendant in an amount or percentage set by the finder of fact.

61. Plaintiff is entitled to the determination requested.

JURY DEMAND

62. A jury is demanded on all counts so triable.

REQUESTED RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:

- A. Award compensatory and punitive damages against Defendant in an amount to be determined at trial;
- B. Award declaratory judgment that Defendant is liable to Plaintiff;
- C. Award pre- and post-judgment interest on all monetary damages in an amount to be fixed by the Court;
- D. Award Plaintiff his costs in bringing this action; and
- E. Award other and further relief as the Court deems just and proper.

Respectfully submitted,

“**Electronically Filed**”

By: /s/ David Z. Ring
/s/ Anna C. Martinez
Attorney for Plaintiff

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CRASH INVESTIGATION
SH 10074
Rev July 2018
NMDOTCR
E July 2018

ALBUQUERQUE POLICE DEPT

STATE OF NEW MEXICO
UNIFORM CRASH REPORT

710777127

E JULY 2018

REPORTING DEPARTMENT

<input type="checkbox"/> Private Property	<input type="checkbox"/> Fatal	Property <input type="checkbox"/> Under \$500 Damage Only <input type="checkbox"/> \$500 or More	Hit-and-Run School Bus Directly Involved School Bus Indirectly Involved Commercial Vehicle Involved	Case Number: 210013235	CAD Num: 210491259			
<input type="checkbox"/> Secondary Crash	<input checked="" type="checkbox"/> Injury			Agency: 1 - ALBUQUERQUE POLICE DEPARTMENT				
Crash Date 02/18/2021		Crash Time 1933	City Occurred In ALBUQUERQUE		County BERNALILLO			
Day of Week THURSDAY		Occurred On: (Route No. or Name) LOUISIANA BLVD SE		At Intersection With: TRUMBULL AVE SE				
Other Location	Measurement	Direction NORTH	Permanent Landmark - County Line - Intersection - Milepost					
					Lat:			
					Long:			
Crash Occurred ON ROADWAY		First Harmful Event COLLISION W/MOTOR VEHICLE		Manner of Impact FRONT-TO-SIDE (EX. T-BONE, ANGLE)	Manner of Crash INTERSECTING PATH (T-BONE)			
<input type="checkbox"/> Work Zone-Construction <input type="checkbox"/> Work Zone-Maintenance <input type="checkbox"/> Work Zone-Utility		Tribal Land? NO	Analysis Code MV IN TRANSPORT			Location of First Harmful Event ON ROADWAY		

TRAFFIC UNIT 01

VEHICLE NO. HEADED	01	MV Type IN TRANSPORT	Direction N	On: LOUISIANA BLVD SE	Left Scene of Crash? NO	Posted Speed 35	Safe Speed 35									
Driver's Last Name APODACA			Driver's First Name AMANDA			Driver's Middle Name										
Driver's Street Address 7913 SOUTHERN AVE SE			City ALBQUERQUE			State NM	Zip Code 87108	Phone (505) 450-9893								
Date of Birth	Driver's License Number	State NM	Type D	CDL V	Status Restrictions	Endorsements	Expires 2024/01/01	Interlock NO	Occupation							
Incident Responder				# of Occupants 2	Seat Pos LF	Age 37	Sex F	Race H	Injury Code C	OP Code 5	OP Used YES	Airbag Deploy B	Ejected N	EMS Number 5	Med Trans EG	
Supplemental Occupant Information																
RF	BARRERAS	ARNEZ	7913 SOUTHERN AVE SE	ALBQUERQUE	NM	87108	11	M	H	B	0	YES	B	O	5	EG

Vehicle Information

Year 2016	Vehicle Make JEEP		Vehicle Model SUV			Color WHI	Veh Use1	Veh Use2	Veh Use3	Veh. Towed? YES	Veh. Disabled? YES						
Body Style PC	Cargo Body Type 2021	Lic. Year 2021	State NM	License Plate Number NZS442			VIN -----D63288			Damage Severity HEAVY	1 2 3 4 5 12 11 10 9 8 7 14-Top 15-Undercarriage						
Towed By EAGLE TOWING				Towed To 11200 CENTRAL AV. SE ALBQUERQUE, NM 87123							Extent DISABLED	09,10,11,12					
Gross Vehicle/Comb Weight Rating			HazMat Placard? (Cargo Only)	HazMat Released (Cargo Only)	Hazmat Placard 4-digit OR Hazmat Name AND			1-digit #			DOT #						
State #		Number of Axles	Carrier Type Code														
Carrier's Name				Street Address				Carrier City				State		Carrier's Zip			
Owner's Last Name APODACA				Owner's First Name AMANDA			Owner's Middle Name			Owner's Company Name							
Street Address 7913 SOUTHERN AVE SE				Owner's City ALBQUERQUE			State NM	Owner Zip 87108		Owner's Phone (505) 450-9893							
Insured By: (Name of Company) STATE FARM				Policy Number 0743586A0131			Trailer or Towed Vehicles (1)	Type	Year	Make	Lic Year	Lic State	License Num				
Trailer or Towed Vehicles (2)		Type	Year	Make	Lic Year	Lic State	License Num		Trailer or Towed Vehicles (3)		Type	Year	Make	Lic Year	Lic State	License Num	

Crash Report Number: 710777127

Case Number: 210013235

STATE OF NEW MEXICO UNIFORM CRASH REPORT
NM STATUTE 66-7-209
ISSUING AGENCY COPY

Sheet 1 Of 5

Condition Information

Lighting DARK LIGHTED		Weather CLEAR			Intersection Type FOUR-WAY		Relation To Junction INTERSECTION			
Work Zone Location		Work Zone Type			Workers Present	Law Enforcement Present				
Road Character STRAIGHT	Road Grade LEVEL	Road Condition DRY		Road Surface LANE MARKERS		Traffic Control TRAFFIC SIGNALS				
Road Lanes 2 LANES	Road Design Div PAINTED DIVIDER (>4 FT)			Road Design FULL ACCESS CONTROL (E.G. HIGHWAY OR INTERSTATE)						
APPARENT CONTRIBUTING FACTORS					DRIVER'S ACTIONS			SEQUENCE OF EVENTS		
NO DRIVER ERROR					GOING STRAIGHT			FIRST EVENT MVT		
								SECOND EVENT		
								THIRD EVENT		
								FOURTH EVENT		
								MHE MVT		
DRIVER/PEDESTRIAN/PEDALCYCLIST SOBRIETY				DRIVER/PED/PEDALCYCLIST PHYSICAL CONDITION			PEDESTRIAN/PEDALCYCLIST ACTION			
HAD NOT CONSUMED ALCOHOL				NO APP. DEFECTS			<input type="checkbox"/> At Intersection	<input type="checkbox"/> Not at Intersection		
							Actions Prior to Crash			
							Actions at Time of Crash			
Breath Test Results		Driver Physical Condition - Other					Location at Time of Crash			

TRAFFIC UNIT 02

VEHICLE NO. HEADED 02	MV Type IN TRANSPORT			Direction E	On: TRUMBULL AVE SE				Left Scene of Crash? NO	Posted Speed 25	Safe Speed 25					
Driver's Last Name HERRON				Driver's First Name JONATHAN					Driver's Middle Name							
Driver's Street Address 604 ESPANOLA ST SE #				City ALBUQUERQUE				State NM	Zip Code 87108	Phone						
Date of Birth 1980-01-01	Driver's License Number 1234567890	State NM	Type D	CDL V	Status RESTRICTED	Restrictions NO RESTRICTIONS	Endorsements NO ENDORSEMENTS	Expires 12/09/2001	Interlock NO	Occupation						
Incident Responder				# of Occupants 3	Seat Pos LF	Age 20	Sex M	Race C	Injury Code C	OP Code 5	OP Used YES	Airbag Deploy N	Ejected N	EMS Number 5	Med Trans NT	
Supplemental Occupant Information																
RF	CHOPITO 608 ESPANOLA SE #B	CATHERINE				18	F	H	C	0	UNK	N	O	5	NT	
RR	VALENZUELA 610 UTAH SE	DOMINIC ALBUQUERQUE			NM	87108	18	M	H	C	0	UNK	N	N	5	NT

Vehicle Information

Year 1996	Vehicle Make JEEP			Vehicle Model CHEROKEE			Color GRY	Veh Use1 P	Veh Use2	Veh Use3	Veh. Towed? YES	Veh. Disabled? YES
Body Style PC	Cargo Body Type 2020	Lic. Year NO	State NM	License Plate Number NONE			VIN -----334985			Damage Severity MODERATE		
Towed By PRIVATE				Towed To PRIVATE					Extent DISABLED			
Gross Vehicle/Comb Weight Rating		HazMat Placard? (Cargo Only)	HazMat Released (Cargo Only)	Hazmat Placard 4-digit OR Hazmat Name AND			1-digit # 1	DOT # 1				
State #		Number of Axles	Carrier Type Code									
Carrier's Name			Street Address				Carrier City				State	Carrier's Zip

Crash Report Number: 710777127	STATE OF NEW MEXICO UNIFORM CRASH REPORT NM STATUTE 66-7-209 ISSUING AGENCY COPY					Sheet 2 Of 5
Case Number: 210013235						

Owner's Last Name HERRON			Owner's First Name JONATHAN			Owner's Middle Name			Owner's Company Name				
Street Address 604 ESPANOLA ST SE #			Owner's City ALBUQUERQUE			State NM	Owner Zip 87108		Owner's Phone				
Insured By: (Name of Company) GAINSCO			Policy Number 35MGEPO24413000			Trailer or Towed Vehicles (1)	Type	Year	Make	Lic Year	Lic State	License Num	
Trailer or Towed Vehicles (2)	Type	Year	Make	Lic Year	Lic State	License Num	Trailer or Towed Vehicles (3)	Type	Year	Make	Lic Year	Lic State	License Num

Condition Information

Lighting DARK LIGHTED		Weather CLEAR					Intersection Type FOUR-WAY		Relation To Junction INTERSECTION			
Work Zone Location			Work Zone Type				Workers Present	Law Enforcement Present				
Road Character STRAIGHT	Road Grade LEVEL	Road Condition DRY			Road Surface LANE MARKERS			Traffic Control TRAFFIC SIGNALS				
Road Lanes 1 LANE		Road Design Div NO SHOULDER			Road Design FULL ACCESS CONTROL (E.G. HIGHWAY OR INTERSTATE)							
APPARENT CONTRIBUTING FACTORS DISREGARDED TRAFFIC SIGNAL								DRIVER'S ACTIONS		SEQUENCE OF EVENTS		
								GOING STRAIGHT		FIRST EVENT MVT		
										SECOND EVENT		
										THIRD EVENT		
										FOURTH EVENT		
								MHE		MVT		
DRIVER/PEDESTRIAN/PEDALCYCLIST SOBRIETY				DRIVER/PED/PEDALCYCLIST PHYSICAL CONDITION				PEDESTRIAN/PEDALCYCLIST ACTION				
HAD NOT CONSUMED ALCOHOL				NO APP. DEFECTS				<input type="checkbox"/> At Intersection		<input type="checkbox"/> Not at Intersection		
								Actions Prior to Crash				
								Actions at Time of Crash				
Breath Test Results		Driver Physical Condition - Other						Location at Time of Crash				

NARRATIVE

ON FEBRUARY 18, 2021 I WAS TRAVELING WEST ON TRUMBULL SE WHEN I CAME TO A STOP AT THE RED LIGHT OF LOUISIANA SE. I OBSERVED A TWO VEHICLES STOPPED AT THE LIGHT IN THE EAST BOUND LANES OF TRUMBULL, JUST WEST OF THE INTERSECTION. I SUDDENLY OBSERVED THE LEAD CAR ON EAST BOUND TRUMBULL TURN SOUTH ON LOUISIANA WHILE THE TRAFFIC SIGNAL WAS STILL RED. AT THAT POINT, I RECALLED THE LIGHT TO STILL BE RED FOR BOTH WEST AND EAST TRUMBULL WHEN I SUDDENLY OBSERVED VEHICLE #2 ENTER THE INTERSECTION AND EAST AND COLLIDED WITH VEHICLE #1 (NM#NZA442) IN THE MIDDLE OF THE INTERSECTION. I IMMEDIATELY HAD DISPATCH START PARAMEDICS DUE TO THE HEAVY VEHICLE DAMAGE. ONCE PARAMEDICS WERE ON SCENE, I SPOKE TO THE DRIVER OF VEHICLE #2 IDENTIFIED AS JONATHAN HERRON. HE EXPLAINED HE WAS AT THE LIGHT IN EAST BOUND LANES OF TRUMBULL WHEN HE OBSERVED THE LIGHT TO TURN GREEN FOR HIM TO CONTINUE EAST THROUGH THE INTERSECTION AND THAT IS WHEN VEHICLE #1 STRUCK HIM. I EXPLAINED TO JONATHAN WHAT I RECALLED SEEING AND HE WAS ADAMANT HIS LIGHT WAS GREEN.

I WAS UNABLE TO INTERVIEW AMANDA THIS DATE AS SHE WAS TRANSPORTED TO THE HOSPITAL WITH HER SON WHO BOTH SUSTAINED INJURIES BUT DID NOT SEEM TO BE LIFE THREATENING.

I ALSO ATTEMPTED TO OBTAIN ANY VIDEO SURVEILLANCE FROM NEARBY BUSINESSES. I CONTACTED SAIS FOOD MART WHO STATED THEY DID NOT HAVE ANY SURVEILLANCE AT THIS TIME. I ALSO ATTEMPTED TO CONTACT NENA'S FOOD BUT HAD NO SUCCESS SPEAKING WITH ANY ONE ON THE TELEPHONE.

VIOLATION 01

VEH NO.	Last Name	First Name	Middle Name	Violation (Common Name)	Action
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CONCLUSION

Time Notified 1933	Time Arrived 1933	Notified By ON SCENE	Supervisor at Scene				
Time Roadway Cleared 2030		Time Incident Cleared 2045	Checked By 5453 - ACCILIEN, MARC - 3/12/2021				
Officer's Signature 		Officer's Name SIMMONS III, ALBERT	Rank P1/C	ID Number 5450	District 337	Report Date 02/22/2021	

DIAGRAM

Diagram Drawn By
SIMMONS III, ALBERT

Measurements Taken By
NOT TO SCALE

DIAGRAM

